

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
EASTERN DIVISION**

UNITED STATES OF AMERICA,)
)
)
v.) **Cr. No. 1:19-cr-10040-JDB**
)
ALEXANDER ALPEROVICH, M.D.)

**RESPONSE IN OPPOSITION TO DEFENDANT YOUNG'S MOTION FOR A CHANGE
IN VENUE**

Comes the defendant, Alexander Alperovich, M.D., through counsel and pursuant to U.S. Const. amend. V and VI and Fed. R. Crim. P. 18, and herein responds in opposition to defendant Jeffrey W. Young, Jr.'s Motion and Memorandum for a Change in Venue [Doc. 126].

At the report date held on May 21, 2020, the Court set today's date as the deadline for Dr. Alperovich to state a position on the record, after conferring with his counsel, on changing venue for the jury trial in his case from Jackson, Tennessee to Memphis, Tennessee. [Doc. 170, Minute Entry].

Dr. Alperovich is board-certified in internal medicine, cardiology, interventional cardiology and is a diplomate of the American Board of Phlebology. He has been a practicing physician for over thirty years. He has been licensed to practice medicine in Tennessee since 2008, has an active cardiology practice in Jackson, and has staff privileges with Jackson Memorial County General Hospital and Regional Hospital in Jackson. [Doc. 14, pgs. 3-4]. Dr. Alperovich is differently situated than the other defendants.

Recognizing the Court has stated the motion for change in venue is probably well taken [Doc. 171, Tr. p. 41, ln. 2-11], after conferring with counsel, Dr. Alperovich respectfully objects to changing venue from Jackson to Memphis for the trial of his case.

Respectfully submitted,

RITCHIE, DILLARD, DAVIES & JOHNSON, P.C.

/s/Stephen Ross Johnson

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CERTIFICATE OF SERVICE

I hereby certify that on May 28, 2020, a copy of the foregoing was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. mail. Parties may access this filing through the Court's electronic filing system.

s/Stephen Ross Johnson